THIS IS THE <u>BEGINNING</u> OF ADMINISTRATIVE FINE CASE # <u>3547</u>

RECEIVED



2018 DEC -4 AM 9: 56

# SENSITIVE

December 4, 2018

**MEMORANDUM** 

TO:

The Commission

THROUGH:

Alec Palmer

Staff Director

FROM:

Patricia C. Orrock PCO

**Chief Compliance Officer** 

Debbie Chacona *DC*Assistant Staff Director
Reports Analysis Division

BY:

Kristin D. Roser/Ben Holly B

Reports Analysis Division Compliance Branch

SUBJECT:

Reason To Believe Recommendation - 2018 October Monthly Report

(Election Sensitive) for the Administrative Fine Program

Attached is the name of a political committee and its treasurer who failed to file the 2018 October Monthly Report (Election Sensitive) in accordance with 52 U.S.C. § 30104(a). The October Monthly Report was due on October 20, 2018.

Under the Administrative Fine Program, the October Monthly Report is considered an election-sensitive filing for authorized committees supporting candidates involved in the general election as well as all unauthorized committees. For the committee listed on the attached RTB Circulation Report, the October Monthly Report was an election-sensitive filing. The committee either filed the report more than five (5) days after the due date, failed to file the report or failed to file the report prior to four (4) days before the general election (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR. 111.43, the committee should be assessed the civil money penalty included on the attached report.

# Recommendation

- 1. Find reason to believe that the political committee and its treasurer, in his official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report.
- 2. Send the appropriate letter.

# Federal Election Commission Reason to Believe Circulation Report 2018 OCTOBER MONTHLY Election Sensitive 10/20/2018 P\_UNAUTH

| AF#  | Committee | Committee Name                           | Candidate<br>Name | Treasurer           | Threshold | PV  | Receipt Date | Days Late  | LOA      | RTB Penalty |
|------|-----------|--|-------------------|---------------------|-----------|-----|--------------|------------|----------|-------------|
| 3547 | C00147231 | CROWLEY MARITIME CORPORATION FEDERAL PAC |                   | DANIEL L.<br>WARNER | \$367,387 | 0 . | 11/5/2018    | Not Filed* | \$28,334 | \$1,866     |

<sup>\*</sup> The committee did not file their report prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

### BEFORE THE FEDERAL ELECTION COMMISSION

| In the Matter of                        | ) |          |
|---|---|----------|
|   | ) |          |
| Reason To Believe Recommendation - 2018 | ) |          |
| October Monthly Report (Election        | ) |          |
| Sensitive) for the Administrative Fine  | ) |          |
| Program:                                | ) |          |
| CROWLEY MARITIME CORPORATION            | ) | AF# 3547 |
| FEDERAL PAC, and WARNER, DANIEL         | ) |          |
| L. MR. as treasurer;                    | ) |          |
|   |   |          |

## **CERTIFICATION**

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 07, 2018 the Commission took the following actions on the Reason To Believe Recommendation - 2018 October Monthly Report (Election Sensitive) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated December 04, 2018, on the following committees:

AF#3547 Decided by a vote of 4-0 to: (1) find reason to believe that CROWLEY MARITIME CORPORATION FEDERAL PAC, and WARNER, DANIEL L. MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

10, 2018 Date

Dayna C. Brown

Secretary and Clerk of the Commission

December 7, 2018

Daniel L. Warner, in official capacity as Treasurer Crowley Maritime Corporation Federal PAC 9487 Regency Square Blvd. Jacksonville, FL 32225

C00147231 AF#: 3547

Dear Mr. Warner:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Monthly Report of Receipts and Disbursements covering the period September 1, 2018 through September 30, 2018. This report shall be filed no later than October 20, 2018. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report prior to four (4) days before the general election held on November 6, 2018, the report is considered not filed for the purpose of calculating the civil money penalty.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On December 7, 2018, the FEC found that there is reason to believe ("RTB") that Crowley Maritime Corporation Federal PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 20, 2018. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$1,866. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See http://www.fec.gov/af/af.shtml. 11 C.F.R. § 111.34. Your payment of \$1,866 is due within forty (40) days of the finding, or by January 16, 2019, and is based on these factors:

Election Sensitivity of Report: Election Sensitive

Level of Activity: \$28,334

Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 6, 2018 are considered not filed for the purpose of calculating the

penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

# 1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or January 16, 2019. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. Id. Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

### 2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Crowley Maritime Corporation Federal PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection

Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

# **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### 4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

#### 5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at http://www.fec.gov/af/af.shtml. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission.

Caron C. Hunter

Caroline C. Hunter

Chair

### ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$1,866 for the 2018 October Monthly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal. Election Commission. It should be sent by mail to:

Federal Election Commission P.O. Box 979058 St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox FEC #979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

#### PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

### PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Crowley Maritime Corporation Federal PAC

FEC ID#: C00147231

AF#: 3547

PAYMENT DUE DATE: January 16, 2019

PAYMENT AMOUNT DUE: \$1,866

# **CROWLEY**

People Who Know

January 2, 2018

Rhiannon R. Magruder Office of Administrative Review Federal Elections Commission 1050 First Street, NE Washington, DC 20002

Re: AF# 3547

Dear Ms. Magruder:

Crowley Maritime Corporation Federal PAC ("Crowley PAC") is in receipt of your letter dated December 7, 2018 in reference to AF# 3547. Crowley PAC wishes to challenge the civil money penalty.

Crowley PAC strives to comply with all Federal Election Commission regulations at all times. We do not deny that the October Monthly Report of Receipts and Disbursements was filed late. The late filing was due to our recent transition to new report filing software and a loss of data experience during the transition. All efforts were made to recover the data and when those proved futile, we undertook the effort of "rebuilding" the database of the PAC's receipts and disbursements based on previously completed monthly reports. Such efforts prevented the accurate compilation of information required to file the monthly report. Despite the lack of timely report filing, the PAC continued proper operation and recordkeeping to ensure proper reporting once all the data reentry was complete. Once the data reentry was completed and all information was current, the late report was filed on November 5, 2018.

Crowley PAC understands the severity of the violation and the need for political action committees to report their activities. The violation related to the Crowley PAC was the result of extenuating and unforeseen events. We have acted in good faith in managing the PAC at all times. Additionally, per your letter, there have not been any previous civil money penalties assessed on the PAC. We believe a penalty of \$1,866 is excessive and respectfully requests reconsideration and mitigation of the penalty amount.

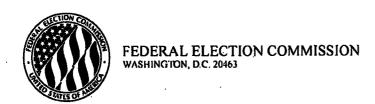
Once again, thank you for your time and consideration. If there are any questions regarding the above explanation, please do not hesitate to contact me david.wood@crowley.com

Respectfully,

David Wood

Government Relations Associate





February 14, 2019

# REVIEWING OFFICER RECOMMENDATION OFFICE OF ADMINISTRATIVE REVIEW ("OAR")

AF# 3489, AF# 3547, and AF# 3552 – Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer (C00147231)

# **Summary of Recommendations**

Make a final determination in AF# 3489 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667.

Make a final determination in AF# 3547 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866.

Make a final determination in AF# 3552 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800.

# Reason-to-Believe Background

The 2018 September Monthly was due on September 20, 2018. The Committee filed the report on November 5, 2018, 46 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). On November 6, 2018, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to file the 2018 September Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$667 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated November 6, 2018 was mailed to the respondents' address of record by the Reports Analysis Division ("RAD") to notify them of the Commission's RTB finding and civil money penalty.

The 2018 October Monthly Report was due on October 20, 2018. The Committee filed the report on November 5, 2018, 16 days late. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). On December 7, 2018, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to file the 2018 October Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated December 7, 2018 was mailed to the respondents' address of record by RAD to notify them of the Commission's RTB finding and civil money penalty.

The 2018 Pre-General Report was due on October 25, 2018. The Committee filed the report on November 5, 2018, 11 days late. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). On December 12, 2018, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to file the 2018 Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$800 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated December 13, 2018 was mailed to the respondents' address of record by RAD to notify them of the Commission's RTB finding and civil money penalty.

# Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee not authorized by a candidate which is filing on a monthly basis shall file monthly reports no later than 20 days after the end of the month. In addition, the treasurer of a political committee not authorized by a candidate which is filing on a monthly basis shall file a pre-general election report no later than the 12<sup>th</sup> day before the general election in any year in which a regularly scheduled general election is held. 52 U.S.C. § 30104(a)(4)(B) and 11 C.F.R. § 104.5(c)(3). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

# Respondents' Challenges

On December 18, 2018, the Commission received the written response ("challenge") for AF# 3489. On January 31, 2019, the Commission received the challenges for AF# 3547 and AF# 3552. The three challenges are substantively identical and explain:

The late filing[s] [were] due to our recent transition to new report filing software and a loss of data experience[d] during the transition. All efforts were made to recover the data and when those proved futile, we undertook the effort of "rebuilding" the database of the PAC's receipts and disbursements based on previously completed monthly reports. Such efforts prevented the accurate compilation of information required to file the...report[s]. Despite the lack of timely report filing, the PAC continued proper operation and recordkeeping to ensure proper reporting once all the data reentry was complete. Once the data reentry was completed and all information was current, the late report[s] [were] filed on November 5, 2018.

Crowley PAC understands the severity of the violation and the need for political action committees to report their activities. The violation related to the Crowley-PAC was the result of extenuating and unforeseen events. We have acted in good faith in managing the PAC at all times. Additionally, per your letter, there have not been any previous civil money penalties assessed on the PAC.

The respondents conclude by stating they believe the penalties are excessive and request the Commission's reconsideration.

### **Analysis**

The Committee explains that it lost its financial data when transitioning to a new filing software. They were forced to rebuild their database, which delayed the filing of the 2018 September Monthly, October Monthly, and Pre-General Reports until November 5, 2018. There are no Commission records that indicate the respondents contacted Commission staff for assistance in rebuilding their data file.

While the Reviewing Officer recognizes the data loss was unexpected, failure of committee computers and/or software is included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. In addition, a committee's history of compliance is not considered when determining if a violation occurred. Therefore, the Reviewing Officer recommends that the Commission make a final determination in AF# 3489, AF# 3547, and AF# 3552 that the respondents violated 52 U.S.C. § 30104(a).

At the time of RTB in AF# 3489, the Commission used an estimated level of activity (\$17,160) to calculate the penalty because the 2018 September Monthly Report had not yet been filed. 11 C.F.R § 111.43(d)(2)(ii). The Committee filed the report on November 5, 2018, 46 days late. The report is not election sensitive and was not filed within 30 days; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). The report discloses \$11,187 in total receipts and \$60 in total disbursements. Therefore, the actual level of activity of the 2018 September Monthly Report is \$11,247. Using the schedule of penalties for not filed non-election sensitive reports at 11 C.F.R § 111.43(a) and for the level of activity bracket of \$10,000 - \$24,999.99, the civil money penalty is \$667 x [1 + (.25 x 0 previous violations)] or \$667. Therefore, the Reviewing Officer confirms the civil money penalty assessed at RTB is correct and recommends that the Commission assess a \$667 civil money penalty.

At the time of RTB in AF# 3547, the Commission used the actual level of activity (\$28,334) to calculate the penalty because the 2018 October Monthly Report had already been filed. 11 C.F.R § 111.43(d)(3). The Committee filed the report on November 5, 2018, 16 days late. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). The report discloses \$8,780 in total receipts and \$19,555 in total disbursements. Therefore, the actual level of activity of the 2018 October Monthly Report is \$28,334. Using the schedule of penalties for not filed election sensitive reports at 11 C.F.R § 111.43(b) and for the level of activity bracket of \$25,000 - \$49,999.99, the civil money penalty is \$1,866 x [1 + (.25 x 0 previous violations)] or \$1,866. Therefore, the Reviewing Officer confirms the civil money penalty assessed at RTB is correct and recommends that the Commission assess a \$1,866 civil money penalty.

At the time of RTB in AF# 3552, the Commission used the actual level of activity (\$9,060) to calculate the penalty because the 2018 Pre-General Report had already been filed. 11 C.F.R § 111.43(d)(3). The Committee filed the report on November 5, 2018, 11 days late. The report is election sensitive and was not filed prior to four days before the general election;

therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). The report discloses \$0 in total receipts and \$9,060 in total disbursements. Therefore, the actual level of activity of the 2018 October Monthly Report is \$9,060. Using the schedule of penalties for not filed election sensitive reports at 11 C.F.R § 111.43(b) and for the level of activity bracket of \$5,000 - \$9,999.99, the civil money penalty is \$800 x [1 + (.25 x 0 previous violations)] or \$800. Therefore, the Reviewing Officer confirms the civil money penalty assessed at RTB is correct and recommends that the Commission assess an \$800 civil money penalty.

### **OAR Recommendations**

- (1) Adopt the Reviewing Officer recommendation for AF# 3489 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination:
- (2) Make a final determination in AF# 3489 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667;
- (3) Adopt the Reviewing Officer recommendation for AF# 3547 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 3547 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866;
- (5) Adopt the Reviewing Officer recommendation for AF# 3552 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (6) Make a final determination in AF# 3552 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800; and
- (7) Send the appropriate letters.

#### **Attachments**

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|-------|-------|---|-----|
| Ашис  | ninen | • | 1 - |

Attachment 2 -

Attachment 3 -

Attachment 4 -

Attachment 5 – Declaration from RAD for AF# 3489
Attachment 6 – Declaration from RAD for AF# 3547
Attachment 7 – Declaration from RAD for AF# 3552

Attachment 8 - Declaration from OAR

# **DECLARATION OF KRISTIN D. RÓSER**

- I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
- It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
- 3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Crowley Maritime Corporation Federal PAC:
  - A) Non-Filer Letter, dated October 9, 2018, referencing the 2018 September Monthly Report (sent via electronic mail to: daiquiri.fennel@crowley.com);
  - B) Reason-to-Believe Letter, dated November 6, 2018, referencing the 2018 September Monthly Report (sent via overnight mail to the address of record).
- 4. I hereby certify that I have searched the Commission's public records and find that Crowley Maritime Corporation Federal PAC filed the 2018 September Monthly Report with the Commission on November 5, 2018.
- Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 30th day of January, 2019.

Kristin D. Roser Chief, Compliance Branch Reports Analysis Division

Federal Election Commission

rederal Election Commission



RQ-7

October 9, 2018

WARNER, DANIEL L. MR., TREASURER CROWLEY MARITIME CORPORATION FEDERAL PAC 9487 REGENCY SQUARE BLVD. JACKSONVILLE, FL 32225

**IDENTIFICATION NUMBER: C00147231** 

REFERENCE: SEPTEMBER MONTHLY REPORT (08/01/2018 - 08/31/2018)

#### Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that <u>electronic filers must submit their reports electronically</u>, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jamie Sikorsky in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

# CROWLEY MARITIME CORPORATION FEDERAL PAC

Page 2 of 2

Sincerely,

Debbie Chacona

Deborah Chacona Assistant Staff Director Reports Analysis Division

250

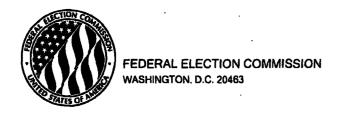
#### **DECLARATION OF KRISTIN D. ROSER**

- I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
- It is the practice of the Reports Analysis Division to document all calls to or from committees
  regarding a letter they receive or any questions relating to the FECFile software or
  administrative fine regulations, including due dates of reports and filing requirements.
- 3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Crowley Maritime Corporation Federal PAC:
  - A) Non-Filer Letter, dated November 5, 2018, referencing the 2018 October Monthly Report (sent via electronic mail to: daiquiri.fennel@crowley.com);
  - B) Reason-to-Believe Letter, dated December 7, 2018, referencing the 2018 October Monthly Report (sent via overnight mail to the address of record).
- 4. I hereby certify that I have searched the Commission's public records and find that Crowley Maritime Corporation Federal PAC filed the 2018 October Monthly Report with the Commission on November 5, 2018.
- Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 13th day of February, 2019.

Ben Holly for KDR Kristin D. Roser

Kristin D. Roser'
Chief, Compliance Branch
Reports Analysis Division

**Federal Election Commission** 



RQ-7

November 5, 2018

WARNER, DANIEL L. MR., TREASURER CROWLEY MARITIME CORPORATION FEDERAL PAC 9487 REGENCY SQUARE BLVD. JACKSONVILLE, FL 32225

**IDENTIFICATION NUMBER: C00147231** 

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2018 - 09/30/2018)

Dear Treasurer: .

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that <u>electronic filers must submit their reports electronically</u>, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jamie Sikorsky in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

# CROWLEY MARITIME CORPORATION FEDERAL PAC

Page 2 of 2

Sincerely,

Oebbie Chacena

Deborah Chacona Assistant Staff Director Reports Analysis Division

250

#### **DECLARATION OF KRISTIN D. ROSER**

 I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.

- 2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
- 3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Crowley Maritime Corporation Federal PAC:
  - A) Reason-to-Believe Letter, dated December 13, 2018, referencing the 2018 12 Day Pre-General Report (sent via overnight mail to the address of record).
- 4. I hereby certify that I have searched the Commission's public records and find that Crowley Maritime Corporation Federal PAC filed the 2018 12 Day Pre-General Report with the Commission on November 5, 2018.
- Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 13th day of February, 2019.

Ben Holly for KDR

Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

# **DECLARATION OF RHIANNON MAGRUDER**

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A political committee not authorized by a candidate which is filing on a Monthly basis in an election year shall file a September Monthly Report by September 20, an October Monthly Report by October 20, and a Pre-General Report no later than the 12<sup>th</sup> day before the general election. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on September 20, 2018 for the 2018 September Monthly Report to be timely filed, October 20, 2018 for the October Monthly Report to be timely filed, and October 25, 2018 for the 2018 Pre-General Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
  - a) Cover, Summary Page, and Detailed Summary Pages of the 2018 September Monthly Report filed by Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, on November 5, 2018.
  - b) Cover, Summary Page, and Detailed Summary Pages of the 2018 October Monthly Report filed by Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, on November 5, 2018.
  - c) Cover, Summary Page, and Detailed Summary Pages of the 2018 Pre-General Report filed by Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, on November 5, 2018.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 14th day of February, 2019.

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

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FEC FORM 3X

# REPORT OF RECEIPTS AND DISBURSEMENTS

| FORM 3X   | For Other Than An Auth   | norized Committee   | Office Us  | e Only  |
|---|--|---|--|---|
| 1. NAME OF<br>COMMITTEE (in full)                     | TYPE OR PRINT ▼  | Example: If typing, type over the lines.                    | 12FE4M5  | 3   |
| Crowley Maritime Co                                   | prporation Federal PAC   | <u> </u>  |  |   |
|   |  |   | <u> </u>   |   |
| DDRESS (number and street)                            | 9487 Regency Square Blyd                                       |   | <del>-                                      </del> |   |
| Check if different than previously reported. (ACC)    | Jacksonville   |   | FL 32225   |   |
| . FEC IDENTIFICATION                                  | NUMBER ▼ CIT   | Y.  | STATE A  | ZIP CODE A  |
| C C00147231   | 3. IS  | STHIS NEW<br>EPORT K (N) OF                                 | AMENDED (A)  |   |
| (Choose One)  (a) Quarterly Reports:                  | Report Due On:   | 20 (M2) May 20 (M2) 20 (M3) Jun 20 (M6) 20 (M4) Jul 20 (M7) | Sep 20 (M9)  | Nov 20 (M11) (Non-Election Year Only)  Dec 20 (M12) (Non-Election Year Only)  Jan 31 (YE) |
| April 15 Quarterly Report                             |  | Primary (12P)   | General (12G)                                      | Runoff (12R)  |
| July 15 Quarterly Report October 15 Quarterly Report  | PRE-Election Report for the:                                   | Convention (12C)  | Special (12S)                                      | <u> </u>  |
| Quarterly Report January 31 Year-End Report           | Ciactia  |   |  | in the State of   |
| July 31 Mid-Yea<br>Report (Non-ele<br>Year Only) (MY) | ction (a) SO-Bay   | General (30G)   | Runoff (30R)                                       | Special (30S)   |
| Termination Rep<br>(TER)                              |  | n on  |  | in the<br>State of  |
| . Covering Period                                     | 08 01 2018   | Y through through 08  | M / 30 0 / Y Y Y                                   | **************************************  |
| certify that I have examined                          | this Report and to the best of<br>Mead, Arthur, , Mr.,<br>urer | my knowledge and belief it is                               | true, correct and complet                          | e.  |
|   | lead, Arthur, , Mr.,   | [Electronically Filed]                                      | Date 110 29  |   |
|   | roneous, or incomplete information                             | n may subject the person signing                            | this Report to the penaltic                        | es of 52 U.S.C. § 3010  |
| Office<br>Use<br>Only                                 |  |   |  | FORM 3X<br>ev. 05/2016  |

# SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

| FEC Form 3X (Rev. 05/2016)  | OF RECEIPTS AND DISBURSEMENTS   | Page 2                            |
|---|---|-----------------------------------|
| Write or Type Committee Name  |   |                                   |
| Crowley Maritime Corporation Fed  | deral PAC   |                                   |
| 3   | 08 01 2018 To   | D: 08 31 2018                     |
|   | COLUMN A<br>This Period   | COLUMN B<br>Calendar Year-to-Date |
| 6. (a) Cash on Hand  January 1,  2018   |   | 89422.71                          |
| (b) Cash on Hand at<br>Beginning of Reporting Period  | 71455.73  |                                   |
| (c) Total Receipts (from Line 19)   | 11187.00  | 77512.58                          |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)          | 82642.73  | 166935.29                         |
| 7. Total Disbursements (from Line 31)   | 59.89   | 84352.45                          |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))                     | 82582.84  | 82582.84                          |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)      | 0.00 grants   |                                   |
| Debts and Obligations Owed BY     the Committee (Itemize all on     Schedule C and/or Schedule D) | 0.00 g  |                                   |
| This committee has qualified as a multi-  | candidate committee. (see FEC FORM 1M)                                  |                                   |
|   | For further information contact:  |                                   |
|   | Federal Election Commission<br>999 E Street, NW<br>Washington, DC 20463 | · .                               |
|   | Toll Free 800-424-9530<br>Local 202-694-1100                            |                                   |

# DETAILED SUMMARY PAGE of Receipts

| C | Form | <b>3X</b> | (Rev. | 05/2016 |
|---|------|-----------|-------|---------|

Page 3

| FEC Form 3X (Rev. 05/2016)  | of Hoodpio   | Page 3   |
|---|--|--|
| Write or Type Committee Name  |  |  |
| Crowley Maritime Corporation Fe   | deral PAC  |  |
| Report Covering the Period: From:   | 08 01 2018 To:   | 08 31 2018   |
| I. Receipts   | COLUMN A<br>Total This Period  | COLUMN B<br>Calendar Year-to-Date  |
| 11. Contributions (other than loans) From:  |  |  |
| (a) Individuals/Persons Other   |  |  |
| Than Political Committees   | 8216.00  | 62077.94   |
| (i) Itemized (use Schedule A)   | hanalanalinenthianikkaankaalkaalkaalkaalkaalankaalkaanka<br>jamagaangaangaangaangaangaangaangaangaang  | The second contribute and the confidence of the  |
| /ii\   Inthonicad   | 471.00   | . 12934.64   |
| (ii) Uniternized(iii) TOTAL (add  | English and American Maria (Agency) and Agency Maria (Agency) and American Agency (Agency).<br>An analysis and a graph and   | harathernethroughes alternational and an experience of a second and a  |
| Lines 11(a)(i) and (ii)   | 8687.00  | 75012.58   |
| 2.1100 11(a)(i) 2.12 (ii)   | generalise en self en et flet translike en selfen en selfen en selfen en selfen selftig en selfen en flet en s<br>En selfen en selfen en still translike en selfen e   | destination of the second seco |
| (b) Political Party Committees  | 0.00   | 0.00   |
| (c) Other Political Committees  | have returned to a supplication of a supplication of the supplicat | - The state of the |
| (such as PACs)  | 0.00 J   | 0.00   |
| (d) Total Contributions (add Lines  |  |  |
| 11(a)(iii), (b), and (c)) (Carry  | Dead to  | 75012.58   |
| Totals to Line 33, page 5)  | 8687.00 Banallamanikan militara salah kanallamanikan militara sala | I and another it there is a subsection of the order of the interior  |
| 12. Transfers From Affiliated/Other   | describerations and construction of marsh and constructions at the construction of   | 0.00   |
| Party Committees  | 0.00 ji  | In a set to prove the second of the second o |
| 40. All Legge Brankerd  | 9.00   | 3 0.00   |
| 13. All Loans Received  | hanneth, ganden middler petter, middler det kannethrer, vilke middler at kannet  | The comment was well as a collection of the consequence of the consequ |
| 44. Lana Barramanta Casabradi   | 6000 g   | 0.00   |
| 14. Loan Repayments Received  | han particular and the control of th | have been altered the collision of the soft that of the collision with the collision with the  |
| <ol> <li>Offsets To Operating Expenditures         (Refunds, Rebates, etc.)     </li> </ol> | the contraction of any of the contraction of the co | gad a see filological contemporary and a secretary consequence of the secretary contemporary and a secretary a   |
| (Carry Totals to Line 37, page 5)   | 0.00   | 0.00   |
| 16. Refunds of Contributions Made   | have all more than a state on the continuent the analysis and the continuent   | Normal manufacturither with a continuent throughouse the continuent of a   |
| to Federal Candidates and Other   | Imagina di madimakan di makan di matan   | Francisco de mario de |
| Political Committees  | 2500.00  | 2500.00  |
| 17. Other Federal Receipts  | literant for a suppression of a said and a suppression and a suppression of the said and a said a said.  | Beginning an english sedit se sedit se<br>Sedit sedit se   |
| (Dividends, Interest, etc.)   | 0.00   | 0.00   |
| 18. Transfers from Non-Federal and Levin Fur  | nds  |  |
| (a) Non-Federal Account   | de out of the second consistency of the seco | Personal mediane discount descriptions de la constant de la consta |
| (from Schedule H3)  | 0.00 f   | 0.00 constant de la company de |
|   | 400  | in 0.00  |
| (b) Levin Funds (from Schedule H5)  | t<br>I om all marken i blimalina allem i blima dom i limalikku allem il  | Enable and anilian formational figure an area in the   |
| In Tabel Transfers (add 40/a) and 40/b))  | d vo   | TO AN  |
| (c) Total Transfers (add 18(a) and 18(b))   | Bornethousetten Albertale weet word have been been been been been been been be   | 0.00<br>   |
|   | ·  |  |
| 19. Total Receipts (add Lines 11(d),  | The state of a conference of a contract of a conference of a c | çı dağı dariya dağı dariya dağı dağı dağı dağı dağı dağı dağı dağ  |
| 12, 13, 14, 15, 16, 17, and 18(c))▶   | 11187.00   | 77512.58   |
| 20 Total Coderal Bassista   |  | •  |
| 20. Total Federal Receipts (subtract Line 18(c) from Line 19)                               | 11187.00   | 77512.58   |
| לפתחת מכור בונוב וסלכ) ווחווו בווופ ופן   | Land of the section of marine the section of the se | Landing the will make a Street of the will week  |

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

| -    | II. Disbursements   | COLUMN A   | COLUMN B   |
|------|---|--|--|
|      |   | Total This Period  | Calendar Year-to-Date  |
| 21.  | Operating Expenditures: (a) Allocated Federal/Non-Federal Activity (from Schedule H4) | The second secon | her see the season of the seas       |
|      | (i) Federal Share   | 0.00   | 0.00   |
|      | (ii) Non-Federal Share  | 0.00   | 0.00   |
|      | (b) Other Federal Operating   | Anna standardi pendi tengat pendi pendi penditan di tengat pendi p | The contraction of the contracti       |
|      | Expenditures  | 59.89  | 585.53   |
|      | (c) Total Operating Expenditures  | hande de son de mande a med a med mande a med a menge a mengen a familie de son familie de son familie de son de s | de samble med kanadi samble med kanta kanta daman daman da sambin sambin sambin sambi<br>ya sambin sa  |
|      | (add 21(a)(i), (a)(ii), and (b))▶   | 59.89  | 585.53   |
| 22.  | Transfers to Affiliated/Other Party   | kannikan di mali handa malamakan di kannikan di kannikan di kannikan di kannikan di kannikan di kannikan di ka<br>Kannikan di kannikan di ka   | termination of the cities of t       |
| 22   | Contributions to  | 0.00 ]   | 0.00 j   |
| 2,0, | Federal Candidates/Committees and Other Political Committees                          | 0.00   | 83766.92   |
| 24.  | Independent Expenditures  | di samulta mand a maddhaire dhaire dhaire dhaire dhair adhair adhaire dhaire adhaire adh<br>gann ang a manga a maga a maga an agus an ag   | kanadiman flamildirandirandirandirandirandirandirandiran   |
| 25   | (use Schedule E)  | 0.00   | 0.00   |
| 23,  | (52 U.S.C. § 30116(d))  | han a fan ei de san Karathan a tra ei de la san de san<br>General que manifesta mengala a mengala a mengala a menan de san de  | has produce a character of the country of the count       |
|      | (use Schedule F)  | 0.00 flat control of the control of  | 0.00 km of the control of the contro       |
| 26   | Loan Repayments Made  | 0.00   | \$ }   |
| 20.  | Loan Repayments Wade  | Records and hard the manufactured the return of the section of the | f 0.00 f<br>The collection of the collection of the<br>Collection of the collection of the |
|      | Loans Made  | 0.00   | 0.00   |
| 20.  | Refunds of Contributions To: (a) Individuals/Persons Other                            | de constant and the extrement of the control of the | free also represente a compresente de la compresenta de la compresenta de la compresenta de la compresenta de<br>Free de la compresenta del compre     |
| •    | Than Political Committees   | 0.00 l   | 0.00 j   |
|      | (h) Delitical Data Committees   | a<br>American de se se de la companya de  | Bearing the second and the second sec       |
|      | (b) Political Party Committees  | 8 0.00 frame de la companya del companya del companya de la compan | 0.00 f   |
|      | (such as PACs)  | 0.00 f   | 0.00   |
|      | (d) Total Contribution Refunds  | I made a financia a material a calma a translation a financia a calma a financia a calma a financia a calma a  | handene kantline iku jiliye ikki nikanda nati - ettimadi mel   |
|      | (add Lines 28(a), (b), and (c))   | 0.00   | 0.00   |
|      |   | Landbourder May Manchard and translation of the publicated   | landarahadianta di militarikan kadinahan di  |
| 29.  | Other Disbursements (Including  | The state of the control of the control of the control of the state of the state of the state of the control of the state  | Esternibuse in a satisfaction of the month and the state of a satisfaction of the sati       |
|      | Non-Federal Donations)  | 0.00   | 0.00   |
| 20   | Federal Election Activity (52 U.S.C. § 30101(   | •  |  |
| JU.  | (a) Allocated Federal Election Activity   | 20))   |  |
|      | (from Schedule H6)  |  | gram menggala sandara kanangan salagan sanggan menggan menggan menggan menggan menggan sandar sebesah sebesah  |
|      | (i) Federal Share   | 0.00   | 0.00   |
|      |   | Leave have a house the continue the continue that a substitute the same the continue the continu | kan mending mendalam dalah mendilan mending mendalam mendalah mend       |
|      | (ii) "Levin" Share  | 0.00   | 0.00   |
|      | (b) Federal Election Activity Paid  | To an all the second se | hazutarakturikkingkinakanikali milimuhurikkingkinghind<br>gunugungungunghingkanigunghan ganganapangungungung   |
|      | Entirely With Federal Funds   | 0.00   | 0.00 b   |
|      | (c) Total Federal Election Activity (add  | The said and the said filling the said and t | ig<br>Section of the conference o    |
|      | Lines 30(a)(i), 30(a)(ii) and 30(b))  | 0.00   | 0.00   |
| 31.  | Total Disbursements (add Lines 21(c), 22,   | graph while monthly the professional straightful profession and the control of th |  |
|      | 23, 24, 25, 26, 27, 28(d), 29 and 30(c))  | 59.89  | 84352.45   |
|      |   | Samuel Land of the Control of the Co | han allana kanad kan   |
| 32.  | Total Federal Disbursements   |  |  |
|      | (subtract Line 21(a)(ii) and Line 30(a)(ii)   | And the Second S | And which as the maginary and an explanation of the control of the       |
|      | from Line 31)   | 59.89  | 84352.45   |
|      |   |  |  |

# **DETAILED SUMMARY PAGE** of Disbursements

| FEC Form 3X (Rev. 05/2016)   | or bisbursements  | Page 5   |  |  |
|--|---|--|--|--|
| III. Net Contributions/<br>Operating Expenditures                    | COLUMN A<br>Total This Period   | COLUMN B Calendar Year-to-Date   |  |  |
| 33. Total Contributions (other than loans) (from Line 11(d), page 3) | 8687.00<br>8000.00  | 75012.58   |  |  |
| 34. Total Contribution Refunds (from Line 28(d))                     | 0.00<br>8687.00   | 0.00 /   |  |  |
| (subtract Line 34 from Line 33)                                      | 59.89   | 585.53   |  |  |
| 37. Offsets to Operating Expenditures (from Line 15, page 3)         | 0.00<br>  | 0.00<br>585.53   |  |  |
|  | English would be a Floren to provide model by a discount to partition of the con- | <sup>1</sup> gerkantegit Mart (1914 megerjanet megersagstygernå regjerere og period i eger er og til ger en propriet i en se |  |  |

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| FEC<br>FORM 3X   | AND                                   | DISBU                                  | JRSE  |                            | s  | .•                                     | Office Use Only      | •  |
|--|---------------------------------------|--|---|----------------------------|--|--|----------------------|--|
| 1. NAME OF<br>COMMITTEE (in full)  | TYPE C                                | R PRINT ▼                              |   | mple: If typion the lines. | ng, type   | 12FE4M                                 | 5                    |  |
| Crowley Maritime   |                                       | n Federal P                            | AC  | <u></u>                    | <del>1 1 - 1 - 1 -</del>   | <u></u>                                |                      |  |
| <u> </u>   | <u> </u>                              |  | <u>. i                                   </u> |                            |  | <u> </u>                               | 1111                 |  |
| . ADDRESS (number and stre   | 9487                                  | Regency Square                         | Blyd  | 1.1.1.1.1                  | <u></u>  |  | <u> </u>             | <br>   |
| <b>▼</b>   | 1 1 1                                 |  | 1111  | 1 1 1                      |  | 1 1 4 4 1                              | 1 1 1 1              |  |
| Check if different<br>than previously<br>reported. (ACC)   | Jack                                  | sonville                               |   | 1.1.1.1                    | لبا  | FL                                     | 32225                | السا   |
| 2. FEC IDENTIFICATIO   | N NUMBER                              | <b>▼</b>                               | CITY A  |                            | s  | STATE <b>A</b>                         | ZIP CO               | DE 🛦   |
| C C00147231  | 100                                   | ;                                      | 3. IS THIS<br>REPORT                          |                            | NEW<br>(N) OR  | AN<br>(A)                              | IENDED               |  |
| 4. TYPE OF REPOR (Choose One) (a) Quarterly Reports:   | · · · · · · · · · · · · · · · · · · · | Monthly Report Due On:                 | Feb 20 (M2)<br>Mar 20 (M3)                    | in the second              | May 20 (M5)<br>Jun 20 (M6)   | Sep                                    | 20 (M8)              | Nov 20 (M11)<br>(Non-Election<br>Year Only)<br>Dec 20 (M12)<br>(Non-Election<br>Year Only) |
| April 15 Quarterly Rep   | port (Q1) - (                         | c) 12-Day                              | Apr 20 (M4)                                   | Primary (12F               | Jul 20 (M7)  |  | 20 (M10)             | Jan 31 (YE) Runoff (12R)   |
| July 15 Quarterly Rep October 15   | port (Q2)                             | PRE-Election<br>Report for the         | n <sub>5'''-3</sub>                           | Convention (               | (12C)  | Special (                              | 90.4                 |  |
| October 15 Quarterly Rep January 31 Year-End Rep   |                                       | E                                      | lection on                                    | MW                         | 0 0 ,  | ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~ | gtete o              |  |
| July 31 Mid-Y<br>Report (Non-e<br>Year Only) (N  | election (                            | d) 30-Day POST-Electi                  | 35  | General (300               | green green  | ·                                      | STI-STIE             | Special (30S)  |
| Termination R<br>(TER)   | Report                                | Порол по                               | lection on                                    | M M M                      | Commence of the control of the contr | Ϋ́, Ϋ́, Ϋ́, Ϋ́, Ϋ́, Ϋ́, Ϋ́, Ϋ́,        | in the               | 4  |
| 5. Covering Period   | 09                                    | 8 2                                    | )18   | through                    | 09   | 30                                     | 2018                 |  |
| certify that I have examing a substitution of the control of the c | Mea                                   | ort and to the be<br>d, Arthur, , Mr., | st of my kno                                  | wledge and                 | belief it is true  | e, correct and                         | d complete.          |  |
| Signature of Treasurer   | Mead, Arthur,                         | , Mr.,                                 |   | [Electronical]             | y Filed) D   | ale 10                                 | 29                   | 2018   |
| NOTE: Submission of false,   | erroneous, or                         | incomplete inforr                      | nation may su                                 | ubject the per             | son signing th   | is Report to ti                        | ne penalties of 52   | U.S.C. § 30109.  |
| Office<br>Use<br>Only  |                                       |  |   |                            |  |  | FEC FOR<br>Rev. 05/2 |  |

# SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

| FEC Form 3X (Rev. 05/2016)  | OF RECEIPTS AND DISBURSEMENTS   | Page 2                                  |
|---|---|---|
| Write or Type Committee Name  Crowley Maritime Corporation F                                      | ederal PAC  | · ·                                     |
| Clowley Marking Corporation 1   | Mam's ( Pologia )   And   | EMIRINE V EDINIDIE V EMIRINA VIA A INTA |
| Report Covering the Period: From:   |   | o: 09 30 2018                           |
|   | COLUMN A<br>This Period   | COLUMN B<br>Calendar Year-to-Date       |
| 6. (a) Cash on Hand   | jorzzeniny  | 89422.71                                |
| (b) Cash on Hand at  Beginning of Reporting Period  | 82582.84  | · .                                     |
| (c) Total Receipts (from Line 19)   | 8779.50 8   | 86292.08                                |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)          | 91362.34  | 175714.79                               |
| 7. Total Disbursements (from Line 31)   | 1955.05   | 103907.50                               |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))                     | 71807.29  | 71807.29                                |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)      | - Compared to the contract of |   |
| Debts and Obligations Owed BY     the Committee (Itemize all on     Schedule C and/or Schedule D) | - 0.00 g  |   |
| This committee has qualified as a mu  | ulticandidate committee. (see FEC FORM 1M)  |   |
|   | For further information contact:  |   |
|   | Federal Election Commission<br>999 E Street, NW<br>Washington, DC 20463   | •                                       |
|   | Toll Free 800-424-9530<br>Local 202-694-1100  |   |

| FEC Form 3X (Rev. 05/2016)  | of Receipts  | Page 3  |
|---|--|---|
| Write or Type Committee Name  |  |   |
| ••  | ral DAC  |   |
| Crowley Maritime Corporation Fede   | · · · · · · · · · · · · · · · · · · ·  | •   |
| Report Covering the Period: From: 09  | 01 2018 To:  | 09 30 2018  |
| I. Receipts   | COLUMN A<br>Total This Period  | COLUMN B<br>Calendar Year-to-Date   |
| 11. Contributions (other than loans) From:  |  |   |
| (a) Individuals/Persons Other   |  |   |
| Than Political Committees   | age of the second secon   | The second secon    |
| (i) Itemized (use Schedule A)   | 8391.00  | 1 70468.94  |
|   | Bergelbergelbergel zu eine der en der er de servel er er de servel er er eine  | The state of the second    |
| (ii) Unitemized   | 388.50 ) heavitanistanistationalitanistanistanistanistanistanistanistani   | 13323.14  |
| (iii) TOTAL (add  | Better the state of the same o   | According to the Control of the Cont    |
| Lines 11(a)(i) and (ii)   | \$ 8779.50 \$ sure in the contract of the contra | 83792.08  |
|   | 3  | 0.00  |
| (b) Political Party Committees  | 0.00   | Anna observat Barna i Albarra Branch     |
| (c) Other Political Committees  | 0.00   | g.co.   |
| (such as PACs)  | English and the first of the state of the st   | In a stranger of the stranger     |
| (d). Total Contributions (add Lines   | agalaman of the highest hand of the highest state of the    | glick i dignorities og et en lage en en eg glick i seg grotte en eg en en eg en en en general en eg en en en e  |
| 11(a)(iii), (b), and (c)) (Carry  | 8779.50 .  | 83792.08  |
| Totals to Line 33, page 5)  | Experite som time at Misse attermed to a till from the most time of the continued and the continued and the continued at the    | hazalanakanikkunkhankhankhankhanakanik  |
| 12. Transfers From Affiliated/Other   | 0.00   | 2 0.00  |
| Party Committees  | Level and red live to a secret broad and a second  | Care the contract the collection of the collection of the collection of   |
| 40 All Loons Dessited   | 0.00   | 0.00  |
| 13. All Loans Received  | hamalamathamathramathramathramathramathramathramathramath  | I marke stall and the additional temporal to the state of    |
|   | demilianisma describir a demilian describenta de milianis  | COO   |
| 14. Loan Repayments Received  | 0.00 p   | 3<br>Samuella material Piene Stane Space ( Signal material m |
| 15. Offsets To Operating Expenditures   |  |   |
| (Refunds, Rebates, etc.)  | a de de la company de la compa   | a<br>Antopological fragistics of the continues of the contin |
| (Carry Totals to Line 37, page 5)   | 0.00 j   | 0.00  |
| 16. Refunds of Contributions Made   |  |   |
| to Federal Candidates and Other   | American conditions when colours of records and an extension of the colours of th   | gamengan ang ang ang ang ang ang ang ang ang  |
| Political Committees  | 0.00 J   | 2500.00   |
| 17. Other Federal Receipts  | Marie Commission of the Commis   | 6.00  |
| (Dividends, Interest, etc.)   | 0.00 \$  | The state of the s    |
| <ol> <li>Transfers from Non-Federal and Levin Funds</li> <li>Non-Federal Account</li> </ol> |  | $p_{ij}$ and $p_{ij}$  |
| Warre Oak adula (10)  | 0.00 E   | 0.00  |
| (from Schedule H3)  | homeollan additional kilomethica disemblikation disemblikational kilomethica dise  | From the conflowed the action of the estile and and activities are  |
|   | 0.00   | 9.00  |
| (b) Levin Funds (from Schedule H5)  | han a faran dha a dha a dha a dha a dhin a faran dha a dhin a faran dha a dhin a dha a dh  | Francisticario de la francista que de la caractería de la    |
| (a) Tatal Transfers (add 40(a) and 40(b))   | 3<br>Secure districtive de secondamente considerant de secondamente de secondamente de secondamente de secondamente  | g VVV   |
| (c) Total Transfers (add 18(a) and 18(b))   | B.O.O H  | 0.00  |
|   |  |   |
| 19. Total Receipts (add Lines 11(d),  | To be the former of the contract of the contra   | A continue to make a continue to the continue     |
| 12, 13, 14, 15, 16, 17, and 18(c))▶   | 8779.50  | 86292.08  |
|   |  | The second secon    |
| 20. Total Federal Receipts  | 0776.66  |   |
| (subtract Line 18(c) from Line 19)▶   | 8779.50  | \$6292.08   |

of Disbursements

FEC Form 3X (Rev. 05/2016)

rsements

Page 4

|             |             | II. Disbursements  | COLUMN A Total This Period   | COLUMN B<br>Calendar Year-to-Date   |
|-------------|-------------|--|--|---|
| 21.         |             | rating Expenditures:<br>Allocated Federal/Non-Federal<br>Activity (from Schedule H4) | Secretarion of the second secretarion of the second | franklandereikterkterikterikterikterikterikterikt   |
|             |             | (i) Federal Share  | 0.00 de la constitució de la c | 0.00 g  |
|             |             | (ii) Non-Federal Share   | 0.00   | 0.00  |
|             | (b)         | Other Federal Operating  | ting the state of  | - Burner & complement through the sales and the self-ment of a contract of the sales of the sale    |
|             | <b>(</b> 0\ | Expenditures Total Operating Expenditures  | 55.05  | \$ 640.58 \\ handlesselle   |
|             | (6)         | (add 21(a)(i), (a)(ii), and (b))   | 55.05  | 640.58  |
| 22.         |             | nsfers to Affiliated/Other Party   | generalization of the control of the | An example of the control of the con    |
| 23.         | Con         | nmitteestributions to  | 1 0.00   | 0.00 j  |
|             | Fed         | eral Candidates/Committees Other Political Committees                                | 19500.00   | 103268.92   |
| 24.         | Inde        | ependent Expenditures  | hander aller de arte de la faction de la fac | The state of the s    |
| 25.         | (52         | s Schedule E)<br>rdinated Party Expenditures<br>U.S.C. § 30116(d))                   | The state of the s | According to the confidence of    |
|             | (use        | Schedule F)  | 00.00 Francisco de la constanción de la constanc | 0.00 Examination of the contract of the contra    |
| 26.         | Loa         | n Repayments Made  | 0.00   | 0.00  |
| 27          | l na        | ns Made  | 0.00   | 0.00  |
| 28.         | Ref         | unds of Contributions To:<br>Individuals/Persons Other                               | franchischer der Steiner geweit steine steinen der seine der seine seine seine seine seine seine seine seine s<br>Anne steine seine se   | managhara misang tangga ta  |
|             |             | Than Political Committees  | 0.00 Particular and the second control of th | 0.00 g  |
|             | (b)         | Political Party Committees   | 0.00   | 0.00  |
|             | (c)         | Other Political Committees   | the matter of the second control of the seco | dinambanahan di pangkan di pangka<br>Pangkan di pangkan di |
|             | /d\         | (such as PACs)  Total Contribution Refunds   | 0.00 fraction of the contraction | 0.00  |
|             | (u)         | (add Lines 28(a), (b), and (c))  | 0.00 fg  | 0.00  |
|             |             | <b>5.</b> 4. 4. 4.   | . Land with the Sound on Brail and Sound well  | Turner the second of the secon    |
| 29.         |             | er Disbursements (Including<br>n-Federal Donations)                                  | 0.00   | 0.00  |
|             | , 10.       |  | And the second s | Lund water of the same of the street of the same of th    |
| 30 <u>.</u> |             | leral Election Activity (52 U.S.C. § 30101( Allocated Federal Election Activity      | 20))   |   |
|             |             | (from Schedule H6) (i) Federal Share   | 0.00   | 0.00  |
|             |             | () 1 040141 011410   | The continue of the continue o | A secretary day of the above dead the second of the control of the    |
|             |             | (ii) "Levin" Share   | 0.00   | 0.00  |
|             | (b)         | Federal Election Activity Paid   | the standard and the standard of the standard  | Secretaristics of the control of the    |
|             | (c)         | Entirely With Federal Funds Total Federal Election Activity (add                     | 0.00 ]   | \$ 0.00 feeting the contract of   |
|             | (0)         | Lines 30(a)(i), 30(a)(ii) and 30(b))   | 0.00 g   | 0.00  |
|             |             |  | Lagrands agreement, agrilled production of the production of the continuous little c | The continue of the continue o    |
| 31.         |             | al Disbursements (add Lines 21(c), 22,   | Institute the contract and the contract and the contract and the contract the contr | and a standard and a standard and a second and   |
|             |             | 24, 25, 26, 27, 28(d), 29 and 30(c))   | 19555.05   | 103907.50   |
| 32.         |             | al Federal Disbursements   |  |   |
|             | •           | btract Line 21(a)(ii) and Line 30(a)(ii) n Line 31)                                  | TORE OF  | garangan aga ang anaga ang ang ang ang ang  |
|             |             | ·· -··- • · //   | 19555.05 )   | 103907.50   |

of Disbursements

ursements .

| _   | FEC Form 3X (Rev. 05/2016)   | Of Dispuisements .   | . Page <b>5</b>  |
|-----|--|--|--|
|     | III. Net Contributions/ Operating Expenditures                           | COLUMN A<br>Total This Period  | COLUMN B<br>Calendar Year-to-Date  |
| •   | Total Contributions (other than loans) (from Line 11(d), page 3)         | 8779.50  | 83792.08<br>- 83792.08   |
|     | Total Contribution Refunds (from Line 28(d))                             |  | 0.00   |
|     | Net Contributions (other than loans) (subtract Line 34 from Line 33)     | 8779.50  | 83792.08   |
| 36. | Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))▶ | 55.05  | 640.58   |
| 37. | Offsets to Operating Expenditures (from Line 15, page 3)                 | 0.00   | 0.00   |
| 38. | Net Operating Expenditures (subtract Line 37 from Line 36)               | to the state of th | here the section of the entry of the section of the |

**PAGE 1/7** 

# **FEC** FORM 3X

# REPORT OF RECEIPTS

|  | or data. And the Annual Committee  | Office Use Only                                   |
|--|--|---|
| NAME OF COMMITTEE (in full)                                | TYPE OR PRINT ▼ Example: If typing, type over the lines.                           | 12FE4M5   |
| Crowley Maritime Corp                                      | oration Federal PAC  |   |
|  | <del></del>  | <del></del>                                       |
|  |  |   |
| ADDRESS (number and street)                                | 9487 Regency Square Blvd   |   |
| ▼ Check if different                                       |  |   |
| Check if different than previously reported. (ACC)         | Jacksonville   | FL 32225  |
| 2. FEC IDENTIFICATION NU                                   | JMBER ▼ CITY ▲   | STATE ▲ ZIP CODE ▲                                |
| C C00147231  | 3. IS THIS NEW   | AMENDED (A)                                       |
| 4. TYPE OF REPORT<br>(Choose One)                          | (b) Monthly Feb 20 (M2) May 20 (M5 Report Due On:                                  | (Non-Election<br>Year Only)                       |
| (a) Quarterly Reports:                                     | Mar 20 (M3) 4 Jun 20 (M6)  | 3   |
| April 15 Quarterly Report (0                               | And Your   | there years                                       |
| July 15 Quarterly Report (C                                | PRE-Election   | When .  |
| October 15 Quarterly Report (0                             | 13)  | Special (12S)                                     |
| January 31<br>Year-End Report (Y                           | There's a 11 08  | in the 2018 State of FL                           |
| July 31 Mid-Year<br>Report (Non-electio<br>Year Only) (MY) | (d) 30-Day   | Runoff (30R) Special (30S)                        |
| Termination Report (TER)                                   |  | in the State of                                   |
| 5. Covering Period 10                                      | 0 01 2018 through 10   | 17. 2018  |
| I certify that I have examined th                          | is Report and to the best of my knowledge and belief it is to Mead, Arthur, , Mr., | rue, correct and complete.                        |
| Type or Print Name of Treasure                             |  |   |
| Signature of Treasurer                                     | d, Arthur, , Mr [Electronically Filed]   | Date 10 29 2018                                   |
| NOTE: Submission of false, erron                           | eous, or incomplete information may subject the person signing                     | this Report to the penalties of 52 U.S.C. § 30109 |
| Office<br>Use  |  | FEC FORM 3X<br>Rev. 05/2016                       |

# SUMMARY PAGE

| FEC <b>Form 3X</b> (Rev. 05/2016)   | OF RECEIPTS AND DISBURSEMENTS  | Page 2    |
|---|--|-----------|
| Write or Type Committee Name  | -  | ·         |
| Crowley Maritime Corporation I  | Federal PAC  | •         |
| Report Covering the Period: From:   | ### Page 2    Page 2   |           |
|   |  |           |
| 6. (a) Cash on Hand  January 1, 2018  | The state of the s | 89422.71  |
| (b) Cash on Hand at<br>Beginning of Reporting Period  | 7,007.00   |           |
| (c) Total Receipts (from Line 19)   | 0.00   | 86292.08  |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)          | 71807.29   | 175714.79 |
| 7. Total Disbursements (from Line 31)   | 9061.16  | 112968.66 |
| Cash on Hand at Close of     Reporting Period     (subtract Line 7 from Line 6(d))                | 62746.13   | 62746.13  |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)      | 0.00   |           |
| Debts and Obligations Owed BY     the Committee (Itemize all on     Schedule C and/or Schedule D) | 0.00   | ·         |
| This committee has qualified as a n   | nulticandidate committee. (see FEC FORM 1M)  |           |
|   | For further information contact:   |           |
|   | Federal Election Commission<br>999 E Street, NW<br>Washington, DC 20463  |           |
|   | Toll Free 800-424-9530<br>Local 202-694-1100   |           |

| FEC <b>Form 3X</b> (Rev. 05/2016)              | of Receipts  | Page 3   |
|--|--|--|
| Write or Type Committee Name                   |  |  |
| Crowley Maritime Corporation Fede              | eral PAC   |  |
|  |  |  |
| Report Covering the Period: From:              | 01 2018 To   | o: 10 17 2018  |
| I. Receipts                                    | COLUMN A<br>Total This Period  | COLUMN B<br>Calendar Year-to-Date  |
| 11. Contributions (other than loans) From:     |  |  |
| (a) Individuals/Persons Other                  |  |  |
| Than Political Committees                      | the control of the co | The state of the s |
| (I) Itemized (use Schedule A)                  | 1 0.00 J   | 70468.94   |
|  | ting the second control of the second contro | Anna Maria Mari  |
| (ii) Uniternized                               | 0.00 f   | 13323.14 (   |
| (iii) TOTAL (add                               | And the second s | And the state of t |
| Lines 11(a)(i) and (ii)                        | 3 0.00 I   | \$ 83792.08 § Sandhinalisa Aldreidengelengilengilen disarahan dalam dalam dan d  |
|  | the state of the second manufactures of a second se | And the state of t |
| (b) Political Party Committees                 | [ 00.0 ]   | 0.00 §   |
| (c) Other Political Committees                 | 0.00   | 0.00   |
| (such as PACs)                                 | hand for the water water water water was the water water was the water was the water | Landan Maria San |
| (d) Total Contributions (add Lines             |  |  |
| 11(a)(iii), (b), and (c)) (Carry               | and the second s | 83792.08   |
| Totals to Line 33, page 5)                     | 0.00 f   | 631 92.00 g<br>Landywell malligarden skanill karlyanila adilian kang   |
| 12. Transfers From Affiliated/Other            | Emerginari de contrata de contrata contrata de contrat | and the second s |
| Party Committees                               | 0.00 I   | g  |
|  | 0.00   | 6 0.00 §   |
| 13. All Loans Received                         | hamilion the Albert water of the Association than the  | I wante grade will be with a will was the water of a will be with a will   |
| •  | and the second s | has the first of the second se |
| 14. Loan Repayments Received                   | 0.00   | 0.00   |
| 15. Offsets To Operating Expenditures          |  |  |
| (Refunds, Rebates, etc.)                       | grange-man-paragrange-man-paragrange-man-  | hantatura tara dina milina mil |
| (Carry Totals to Line 37, page 5)              | 0.00 ]   | 0.00   |
| 16. Refunds of Contributions Made              |  |  |
| to Federal Candidates and Other                | Annualistic mention of the second of the sec | tan metamatikan ditangkan di amerikan metaman kanan dia menteria metaman di a  |
| Political Committees                           | 0.00   | 2500.00  |
| 17. Other Federal Receipts                     | t in the state of  | Francis Brown Strang Strang<br>Control Strang  |
| (Dividends, Interest, etc.)                    | 0.00   | 00.00  |
| 18. Transfers from Non-Federal and Levin Funds | and the second s | and the control and the second special special special second second second second second second second second   |
| (a) Non-Federal Account                        | il anno lanco cida con cidano contrava cigamenta e contrava de considera contrava de considera contrava de con   | has an alternative and the second consideration of the second consideration of the second control of the second  |

19. Total Receipts (add Lines 11(d), 86292.08 12, 13, 14, 15, 16, 17, and 18(c))....... 0.00 20. Total Federal Receipts

0.00

0.00

0.00

0.00

0.00

86292.08

(subtract Line 18(c) from Line 19) ......▶

(from Schedule H3).....

(b) Levin Funds (from Schedule H5) .......

(c) Total Transfers (add 18(a) and 18(b))..

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

| II. Disbursements   | COLUMN A<br>Total This Period  | COLUMN B Calendar Year-to-Date   |
|---|--|--|
| Operating Expenditures:                                       |  |  |
| (a) Allocated Federal/Non-Federal Activity (from Schedule H4) | the state of the second second the second  | The control of the co |
|   | 0.00   | § 0.00   |
| (i) Federal Share   | The control of the    | English di sandini made anna dhen made anna dhe made anna dhe made ann dhe ann dhe ann dhe<br>ga tangga anna anna anna ann ann ann ann ann   |
| (ii) Non-Federal Share  | 0.00   | 0.00   |
|   | and the second s |  |
| (b) Other Federal Operating                                   | 61.16  | 701.74   |
| Expenditures  | has a three attended to real man Beautifficants and tracifficant traces.   | kanadi madamatan nika nika nika mbamatan dan milamatan dan nika nika<br>pamapan nika nika galangan nigan nigan nika nigan nika nigan nika nigan mb   |
| (c) Total Operating Expenditures                              | garanga manganangan ay sangarangan ay sangarangan ay sangarang   | 701.74   |
| (add 21(a)(i), (a)(ii), and (b))▶                             | 81.16 Barrier and the control of the | Bases Bases (See See See See See See See See See Se  |
| Transfers to Affiliated/Other Party                           | 9  | 0.00   |
| Committees Contributions to                                   | 0.00 for the second sec | Landendon Machandan disaberakan kerdibuah  |
| Federal Candidates/Committees                                 | 3  | A proposition of the property of the state of the same of the same between the state of the same of th |
| and Other Political Committees                                | 9000.00 }  | 112266.92  |
| Independent Expenditures                                      | Brown and the work of the second in our set is to have the second in our window property and work and with the second in the sec | handers de sont de sont de la company de sont de sont de la company de la company de la company de la company<br>grander production de la company de la c  |
| (use Schedule E)  | . I 0.00 I   | 0.00   |
| (52 U.S.C. § 30116(d))  | Emotodore with restriction also with a continuous francoities a character  | Free grant to the second consistency of the second consistency of the second consistency of grant and gran |
| (use Schedule F)  | 0.00   | 0.00   |
|   | han sa karan k<br>Sa karan   | kanandisersatamidikan opin madan dikan dimendisersat kan madan dibibban di<br>gan ngapan ngapan ngapan ngan mga mga maga manga manga mangan ngan   |
| Loan Repayments Made  | 0.00   | 0.00   |
|   | langung kang alka sa Maranda mada madalin na langung di menghintan di kanada na kalangan di kanada na kalangan<br>Sa mangan ma   | ham elemente est la la company de la comp<br>La company de la company de   |
| Loans Made  | 0.00   | 0.00   |
| Retunds of Contributions To:                                  | han side - under and the author and south to a the contribution of the section of | hannedigen die oordelijk op die die gebruik van die  |
| (a) Individuals/Persons Other Than Political Committees       | 0.00   | 0.00   |
| That I shada committees                                       | है ।<br>देशकार प्रकार के कार के देशकार के देशकार के कार के<br>दुश्या का स्कृतिक का कार का कार का कार का कार का   | The state of the s |
| (b) Political Party Committees                                | 0.00   | 0.00   |
| 1 1   | 3<br>  | ka saadhan ahaa ah ga ah   |
| • •   | 0.00   | 5 0.00   |
| (such as PACs)  | the state of the s | The state of the s |
| (d) Total Contribution Refunds                                | Pertinalistic or effectively and consequent for an effective for a second consequence of the consequence of  | Antonial security of the second security of second security of second se |
| (add Lines 28(a), (b), and (c))▶                              | 0.00   | 0.00   |
|   | have the control of the state of   | Townstein and the good and the continue of the continue of   |
| . Other Disbursements (Including                              | transforms bearing bearings and an internal control of the control | Francisco de la company de   |
| Non-Federal Donations)  | 0.00   | 0.00   |
| •   | han dha an tara dha an tar   | The same of the country went the country of the country of the same of the country of the countr |
| Federal Election Activity (52 U.S.C. § 30101)                 | (20))  | •  |
| (a) Allocated Federal Election Activity                       |  |  |
| (from Schedule H6)  | gradient op de servición de la constitue de la   | Towns with many till as a graph of the continue of   |
| (i) Federal Share   | 0.00   | 0.00   |
|   | de angul sangan di angul da angula ya sangan na disana da angula na disana di disana di disana di angula na mg<br>Mangan ngangan ngang na mga na mg   | kannakan aksarikan hikima kannakan kilan di kannakan aksarikan di kannakan sa di kilan di kannakan di kannakan<br>Sa mangan mengan me   |
| (il) "Levin" Share  | 0.00   | 0.00   |
| (b) Federal Election Activity Paid                            | รี้<br>การเหลือเลย เลียกรั้ง เรื่องเลยสินครามสินคารที่สินครามสินครามสินครามสินครามสินครามสินครามสินครามสินครามสิน<br>เรื่องการเหลือเลย เลียกรั้ง เรื่องสินครามสินครามสินครามสินครามสินครามสินครามสินครามสินครามสินครามสินครามสินครา  | The state of the control of the cont |
| Entirely With Federal Funds                                   | 0.00   | 0.00   |
| (c) Total Federal Election Activity (add                      | has a Marcall and I have be read to a little or have discovered and have been the  | hazardhazardha eildheashtarailtan allain dheasatarailtean dhiireadh  |
| Lines 30(a)(i), 30(a)(ii) and 30(b))                          | 0.00   | 0.00   |
| - and soletin soletin and soletine                            | المساولة والمساولة والمسا  | Lander with with a section of the contract of  |
|   |  |  |
| . Total Disbursements (add Lines 21(c), 22,                   | Formelianistican beautican bases in the contraction of the contraction in the contraction  | Francischer und Steiner der Steiner Steiner und der seine Steiner und der seine Steiner und der seine Steiner der seiner der s |
| 23, 24, 25, 26, 27, 28(d), 29 and 30(c))                      | 9061.16  | 112968.66  |
| •   | Emmaller on all and the Complete and American Street Section 18 and 18 a | En en de transport en grobbe de groeid versche van 1800 van de transport de de state de transport de state de  |
| . Total Federal Disbursements                                 |  |  |
| (subtract Line 21(a)(ii) and Line 30(a)(ii)                   | A state of the state of the section  | der der Albert gerälle sein sicher mer Ansternen besonder aus der neuer der er und eine er und eine der der se   |
| from Line 31)   | 9061.16  | •  |
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(subtract Line 37 from Line 36) ......

# **DETAILED SUMMARY PAGE**

of Disbursements

Page 5 FEC Form 3X (Rev. 05/2016) COLUMN A COLUMN B III. Net Contributions/ **Total This Period** Calendar Year-to-Date **Operating Expenditures** 33. Total Contributions (other than loans) (from Line 11(d), page 3) ..... 34. Total Contribution Refunds 0.00 (from Line 28(d))..... 35. Net Contributions (other than loans) 0.00 83792.08 (subtract Line 34 from Line 33) ..... 36. Total Federal Operating Expenditures 61.16 701.74 (add Line 21(a)(i) and Line 21(b)) .........▶ 37. Offsets to Operating Expenditures 0.00 0.00 (from Line 15, page 3)..... 38. Net Operating Expenditures 61.16 701.74



February 14, 2019

Daniel L. Warner, in official capacity as Treasurer Crowley Maritime Corporation Federal PAC 9487 Regency Square Blvd. Jacksonville, FL 32225

C00147231

AF#: 3489, 3547, 3552

Dear Mr. Warner:

On November 6, 2018, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 September Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$667 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 7, 2018, the Commission found RTB that respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 October Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 12, 2018, the Commission found RTB that respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$800 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a civil money penalty in AF# 3489, AF# 3547, and AF# 3552. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 1050 First Street, NE, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review



2019 APR -2 PM 1: 26

# **SENSITIVE**

April 2, 2019

#### **MEMORANDUM**

To:

The Commission

Through:

Alec Palmer AP hy MAH
Staff Director

From:

Patricia C. Orrock ACO **Chief Compliance Officer** 

Rhiannon Magruder RM

**Reviewing Officer** 

Office of Administrative Review

Subject:

Final Determination Recommendation in AF# 3489, AF# 3547, and AF# 3552 -

Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official

capacity as Treasurer (C00147231)

On November 6, 2018, the Commission found reason to believe ("RTB") in AF# 3489 that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 September Monthly Report and made a preliminary determination that the civil money penalty was \$667 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 7, 2018, Commission found RTB in AF# 3547 that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 October Monthly Report and made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 12, 2018, the Commission found RTB in AF# 3552 that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Pre-General Report and made a preliminary determination that the civil money penalty was \$800 based on the schedule of penalties at 11 C.F.R. § 111.43.

On December 18, 2018 and January 31, 2019, the Commission received their written responses ("challenges"). After reviewing the challenges, the Reviewing Officer Recommendation ("ROR") dated February 14, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination in AF# 3489 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667; make a final determination in AF# 3547 that the respondents violated 52 U.S.C. § 30104(a) and assess a

civil money penalty of \$1,866; and make a final determination in AF# 3552 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On April 2, 2019, the respondents indicated they did not intend to submit a response.

#### **OAR Recommendations**

- (1) Adopt the Reviewing Officer recommendation for AF# 3489 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 3489 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667;
- (3) Adopt the Reviewing Officer recommendation for AF# 3547 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 3547 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866;
- (5) Adopt the Reviewing Officer recommendation for AF# 3552 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (6) Make a final determination in AF# 3552 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800; and
- (7) Send the appropriate letters.

## BEFORE THE FEDERAL ELECTION COMMISSION

| In the Matter of                          | ) |                         |
|---|---|-------------------------|
|   | ) | AFs 3489, 3547 and 3552 |
| Final Determination Recommendation:       | ) |                         |
| Crowley Maritime Corporation Federal      | ) |                         |
| PAC and Daniel L. Warner, in his official | ) |                         |
| capacity as Treasurer (C00147231)         | ) |                         |

## **CERTIFICATION**

I, Dayna C. Brown, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on April 11, 2019, the Commission decided

by a vote of 4-0 to take the following actions in AFs 3489, 3547, and 3552:

- 1. Adopt the Reviewing Officer recommendation for AF# 3489 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination.
- 2. Make a final determination in AF# 3489 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667.
- 3. Adopt the Reviewing Officer recommendation for AF# 3547 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination.
- 4. Make a final determination in AF# 3547 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866.

Federal Election Commission AFs 3489, 3547, 3552 April 11, 2019

- 5. Adopt the Reviewing Officer recommendation for AF# 3552 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination.
- 6. Make a final determination in AF# 3552 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800.
- 7. Send the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

7 11, 2019 Date

Dayna C. Brown

Secretary and Clerk of the Commission



April 16, 2019

Daniel L. Warner, in official capacity as Treasurer Crowley Maritime Corporation Federal PAC 9487 Regency Square Blvd. Jacksonville, FL 32225

C00147231 AF# 3547

Dear Mr. Warner:

On December 7, 2018, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2018 October Monthly Report. By letter dated December 7, 2018, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$1,866 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On January 31, 2019, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assess a civil money penalty in the amount of \$1,866 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on February 14, 2019.

On April 11, 2019, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$1,866. A copy of the Final Determination Recommendation is attached.

At this juncture, the following courses of action are available to you:

#### 1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during

the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

# 2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

#### 3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

# **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

#### 4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

## 5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Eller L. Wounts and

Ellen L. Weintraub

Chair

# **ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$1,866 for the 2018 October Monthly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit <a href="https://www.fec.gov/af/pay.shtml">www.fec.gov/af/pay.shtml</a> to be directed to Pay.gov's Administrative Fine Program Payment form. This penalty may also be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission PO Box 979058 St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox FEC #979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

#### PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

#### PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Crowley Maritime Corporation Federal PAC

FEC ID#: C00147231

AF#: 3547

PAYMENT AMOUNT DUE: \$1,866

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3547